

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

PRESTON BENNETT,	)	
	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	No. 18-cv-4268
	)	
THOMAS DART, SHERIFF OF	)	Honorable Judge
COOK COUNTY (in his official capacity),	)	John Robert Blakey
AND COOK COUNTY, ILLINOIS,	)	
	)	
Defendants.	)	
	)	

**AGREEMENT REGARDING EXAMINATION OF COOK COUNTY JAIL –  
DIVISION 10**

At the request of counsel for the Plaintiff, Defendant Cook County Sheriff and counsel for Plaintiff Preston Bennett agree to an inspection of the individual in custody toilets and showers for each tier in Division 10 of the Cook County Department of Corrections.

This inspection will take place during a single visit on Friday, April 28, 2023, between 9:30 am and 2:00 pm. Division 10 is located at 2950 S. California Avenue, Chicago, Illinois 60608.

On behalf of the Plaintiff, the following persons will participate in the visit and inspection of Division 10:

- Patrick Morrissey, Attorney for the Plaintiff
- Thomas Morrissey, Attorney for the Plaintiff
- Gary B. Keclik, Plaintiff's retained expert

Mr. Keclik will bring into the facility one hand-held camera, one tape measure, paper, and one pen. Attorneys P. Morrissey and T. Morrissey will each bring into the facility one paper notebook and one pen.

Each of the sixteen common/communal bathroom/shower rooms for each of the sixteen tiers in Division 10 of the Cook County Department of Corrections may be inspected, measured, or photographed. Counsel for Plaintiff may inspect, measure, and photograph any cell of Division 10, with the understanding that

the entire inspection visit must be completed within the allotted time frame of 9:30 am and 2:00 pm.

No other facilities and/or locations of the CCDOC will be inspected, measured, or photographed during this visit.

The inspection, and all photographs and measurements, will take place in the presence of counsel for all parties to the case, and employees of the Cook County Sheriff's Office. Neither Plaintiff's counsel, nor representatives of Plaintiff or Plaintiff's counsel, will question any representatives of the Cook County Sheriff's Office, or any other individuals providing access to Division 10, during the inspection.

Copies of all photographs and measurements taken by counsel of record during the inspection will be provided to all counsel within 30 days of the inspection date.

Each of the undersigned expressly acknowledges that he/she is assuming any and all risk of injury arising from his/her entry upon the premises. Each of the undersigned acknowledges that he/she will hold the Cook County Sheriff's Office, and any of its affiliates, agents, representatives and employees, harmless from all claims of any nature by any of the undersigned claiming injury or damage resulting from his/her inspection of the premises.

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Print Name

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Signature

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Print Name

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Signature

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Print Name

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Signature